

BEFORE THE
Federal Communications Commission
WASHINGTON, D.C. 20554

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APR - 1 1996

In the Matter of

Amendment of Parts 2 and 25)
of the Commission's Rules to)
Allocate the 13.75 - 14.0 GHz)
Band to the Fixed-Satellite)
Service)

ET Docket No. 96-20
RM-8638

COMMENTS OF LORAL AEROSPACE HOLDINGS INC.

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April 1, 1996

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COMMENTS OF LORAL AEROSPACE HOLDINGS INC.

Through its counsel, Loral Aerospace Holdings Inc. ("LAHI") hereby submits its comments in favor of the above captioned proceeding. On February 13, 1996 the Commission adopted a Notice of Proposed Rulemaking in response to a Petition for Rulemaking filed by Hughes Communications Galaxy, Inc.¹ LAHI, through its Space Systems/Loral affiliate, manufactures and supplies high-performance communications satellites to customers on a global basis. LAHI has also applied to construct, launch and operate two satellites which employ Ku-band frequencies, LoralSat 101 and LoralSat 102.² As both a

¹ In the Matter of Parts 2 and 25 of the Commission's Rules to Allocate the 13.75 - 14.0 GHz Band to the Fixed Satellite Service (FCC 96-55, Released February 23, 1996).

² See FCC File Nos. 72/73-SAT-P/LA-95 and 137-SAT-P-95 (filed February 15, 1995).

spacecraft manufacturer and a new satellite services provider, LAHI has a direct interest in this proceeding.

LAHI supports the Commission's proposal and believes that its adoption will promote efficient use of the scarce orbital arc and increase competition in the satellite services business. Furthermore, the allocation would enhance consumer choice for satellite services by stimulating provision of international satellite services and would thereby foster the public interest.

I. A Discrepancy Exists Between Available Uplink and Downlink Spectrum in the Fixed Satellite Service That Unduly Limits Satellite Capacity

The effective capacity (i.e., throughput) of a communication satellite transponder is limited by the lower amount of spectrum available for either uplinks or downlinks. The satellite cannot use "excess" available uplink or downlink spectrum to increase its available capacity.

The current allocation for Ku-band satellites in the Fixed Satellite Service is:

Frequency Range	Current FCC Allocation
14.0 - 14.5 GHz	Earth to Space (Uplink)
10.95 - 11.2 GHz	Space to Earth (Downlink) - International Systems Only
11.45 - 11.7 GHz	Downlink - International Systems Only
11.7 - 12.2 GHz	Downlink

At present, only 500 MHz of domestic uplink spectrum is available to Ku-band systems in the fixed satellite service while 1000 MHz of downlink spectrum has been allocated.³ Allocating additional uplink spectrum would allow satellite operators to make more efficient use of the available downlink spectrum.

II. Domestic Allocation of Extended Ku-Band for Uplinks Permits More Efficient Satellite Design and Operation

The allocation of 250 MHz contiguous with the existing uplink between 14.0 and 14.5 GHz has the added benefits of enhancing satellite efficiencies through effective design and reliability improvements. The contiguous spectrum provides an optimum resource for improved communications links both domestically and for potential international service, by spot and/or wide area beams. This spectrum allocation enhances the satellite's capability and system characteristics, enabling increased volume and more effective communications services that can be provided to more users at a lower cost.

³ 47 C.F.R. § 25.202(a)(1)

Wherefore, for the reasons outlined above, LAHI respectfully requests that the Commission adopt rules allocating the 13.75 - 14.0 GHz frequency band to the Fixed Satellite Service as set out in the Commission's Notice of Proposed Rulemaking.

Respectfully submitted,
LORAL AEROSPACE HOLDINGS, INC.

By:



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April 1, 1996

CERTIFICATE OF SERVICE

I hereby certify that I have this 1st day of April, 1996, caused copies of the foregoing "Comments of Loral Aerospace Holdings Inc." to be served by hand on the following:

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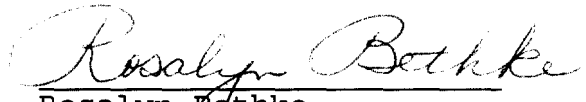
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